

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK**

MARK PRINCIPE, individually on behalf of
himself and all others similarly situated,

Plaintiff,

-against-

EDISON NATION, LLC, PLYMOUTH
DIRECT, INC., EDISON NATION
HOLDINGS, LLC, SAFETV SHOP LLC,
MEDIA ENTERPRISES II, INC.,
ENVENTYS, LLC, JOHN DOES 1-25,

Defendants.

Case No. 2:15-cv-05453-ADS-AKT

**PLAINTIFF'S NOTICE OF
MOTION AND MOTION FOR
CLASS CERTIFICATION**

PLEASE TAKE NOTICE that Plaintiff hereby moves the Court for entry of an order certifying the proposed class and appointing Plaintiff's attorneys as class counsel.

Plaintiff seeks certification of a nationwide class, composed of the individuals throughout the United States, who purchased one or more Gyro Bowls at any time during the applicable statute of limitations period.

Plaintiff also seeks certification, to the extent necessary or appropriate, of a subclass of individuals who purchased Gyro Bowls in the State of New York at any time during the applicable statute of limitations period.

Plaintiff further requests that this Court appoint Plaintiff's attorneys, The Sultzer Law Group P.C. and Rosenberg Fortuna and Laitman LLP, to serve as class counsel pursuant to Rule 23(g) of the Federal Rules of Civil Procedure.

This Motion is made pursuant to Rule 23 of the Federal Rules of Civil Procedure, on the grounds that Plaintiff meet the requirements for class certification under Rules 23(a) and 23(b)(3), and is based on this Notice of Motion and Motion, the accompanying Memorandum of Points and

Authorities in Support of Class Certification, declarations in support thereof, any oral argument that may be heard, the complete files and record of this action, and such other and further matters as the Court may properly consider.

Dated: New York, New York
December 22, 2017

Respectfully Submitted,

THE SULTZER LAW GROUP, P.C.

/s/ Adam Gonnelli

By: _____

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